

BERNARD M. RESSER (SBN 92873)
BResser@GreenbergGlusker.com
GREENBERG GLUSKER FIELDS
CLAMAN & MACHTINGER LLP
1900 Avenue of the Stars, 21st Floor
Los Angeles, California 90067-4590
Telephone: 310.553.3610
Fax: 310.553.0687

MONICA V. RAMALLO-YOUNG (SBN 225546)
ramalloyoung@gmail.com
LAW OFFICES OF MONICA V. RAMALLO-YOUNG
15303 Ventura Boulevard; 9th Floor
Sherman Oaks, CA 91403
Telephone: 818.723-6357
Fax: 818.368-8034

Attorneys for Plaintiff
Wared Alfarah d/b/a Vape N Connect

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA –SAN JOSE DIVISION

WARED ALFARAH d/b/a VAPE N
CONNECT, an individual,

Plaintiff,

v.

CITY OF SOLEDAD, and Does 1
through 50, inclusive,

Defendants.

Case No. C15-05569 EJD

**STIPULATION AND [PROPOSED]
ORDER EXPANDING THE
DEADLINE FOR PLAINTIFF
WARED ALFARAH TO FILE AN
OPPOSITION TO CITY OF
SOLEDAD'S MOTION TO DISMISS**

Action Filed: December 3, 2015

1 WHEREAS, on December 3, 2015, Plaintiff Wared Alfarah d/b/a Vape N
2 Connect filed a federal Complaint in the Northern District Court of California
3 against Defendant City of Soledad; and,

4 WHEREAS, on December 29, 2015, the Court granted an Order by Stipulation
5 of the parties extending the time for Defendant City of Soledad to respond to the
6 Complaint to January 8, 2016;

7 WHEREAS, on January 7, 2016, Defendant, City of Soledad filed a Motion
8 to Dismiss Plaintiff's Complaint; and

9 WHEREAS, on January 21, 2016, the Court continued the hearing on the
10 Motion to Dismiss to June 23, 2016; and

11 WHEREAS, counsel for Defendant Ryan Thompson, has agreed to grant
12 counsel for Plaintiff Wared Alfarah, an extension of time to file an Opposition to
13 the Motion to Dismiss; and

14 WHEREAS the respective parties agree that the new deadline for Plaintiff
15 Wared Alfarah to file an Opposition to the Motion to Dismiss is Thursday,
16 February 4, 2016 and the deadline for Defendant City of Soledad to file a reply to
17 the Opposition is Thursday, February 11, 2016.

18 THE PARTIES STIPULATE AS FOLLOWS:

19 That the deadline for Plaintiff Wared Alfarah to file an Opposition to the
20 Motion to Dismiss is Thursday, February 4, 2016 and the deadline for Defendant
21 City of Soledad to file a reply to the Opposition is Thursday, February 11, 2016.

22 Dated: January 21, 2016
23

24 By: /s/
25 MONICA RAMALLO-YOUNG
26 Attorneys for Plaintiff WARED ALFARAH
27
28

1 Dated: January 21, 2016

LAW OFFICES OF VINCENT P. HURLEY
A Professional Corporation

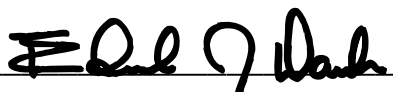
3 By: /s/
4 RYAN THOMPSON
5 Attorneys for Defendant CITY OF SOLEDAD

6
7 [PROPOSED] ORDER

8 The Court, having reviewed the above Stipulation of the parties and the
9 attached declaration of counsel, and good cause appearing, hereby ORDERS that
10 deadline for Plaintiff Wared Alfarah to file an Opposition to the Motion to Dismiss
11 is Thursday, February 4, 2016 and the deadline for Defendant City of Soledad to
12 file a reply to the Opposition is Thursday, February 11, 2016.

13
14
15 PURSUANT TO STIPULATION, IT IS SO ORDERED

16
17 Dated: 1/22/2016

18 By: 
19 JUDGE EDWARD J. DAVILA

GREENBERG GLUSKER FIELDS CLAMAN
& MACHTINGER LLP
1900 Avenue of the Stars, 21st Floor
Los Angeles, California 90067-4590